

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHAWN D. CUFF,

Defendant.

Criminal Action No. 07- 127-UNA

REDACTED

**INDICTMENT**

The Grand Jury for the District of Delaware charges that:

**COUNT ONE**

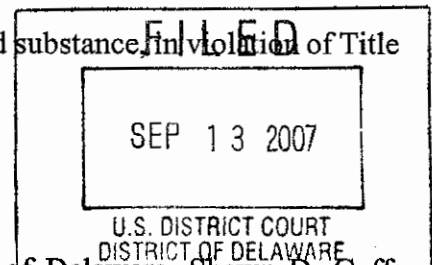
On or about July 18, 2007, in the State and District of Delaware, Shawn D. Cuff, defendant herein, did knowingly possess with intent to distribute a mixture and substance containing a detectible amount of cocaine base, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT TWO**

On or about July 18, 2007, in the State and District of Delaware, Shawn D. Cuff, defendant herein, did knowingly possess with intent to distribute a mixture and substance containing a detectible amount of oxycodone, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT THREE**

On or about July 22, 2007, in the State and District of Delaware, Shawn D. Cuff, defendant herein, did knowingly possess with intent to distribute more than 5 grams of a mixture and substance containing a detectible amount of cocaine base, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).



**NOTICE OF FORFEITURE**

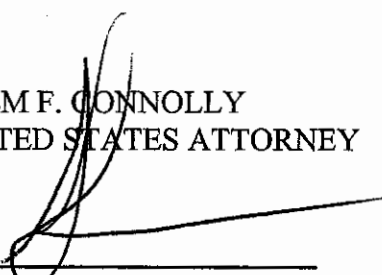
Upon conviction of one or more of the offenses alleged in Counts One through Three of this Indictment, Defendant Shawn D. Cuff shall forfeit to the United States pursuant to 21 U.S.C. § 853 and 28 U.S.C. § 2461(c), any property, real and personal, that constitutes or is derived from or is traceable to proceeds obtained directly or indirectly from the commission of the offense; and all property, real or personal, that was used to facilitate, or was intended to be used to facilitate the commission of the offense, including, but not limited to, approximately \$2,182 in United States currency.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL:

\_\_\_\_\_  
Foreperson

COLM F. CONNOLLY  
UNITED STATES ATTORNEY

By:   
Shawn A. Weede  
Assistant United States Attorney

Dated: September 13, 2007